

HUSCH BLACKWELL

Jenna M. Stupar
Attorney

120 South Riverside Plaza, Suite 2200
Chicago, IL 60606-3912
Direct: 312.526.1590
Fax: 312.655.1501
jenna.stupar@huschblackwell.com

July 18, 2016

CERTIFIED MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Re: FOIA Requests for Records Relating to Dr. Richard DeGrandchamp

Dear Sir or Ma'am:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, please forward to my attention any and all documents and information relating to the investigations involving Dr. Richard DeGrandchamp including the following:

- *US v. Magnesium Corporation of Am.*, 616 F.3d 1129 (10th Cir. 2010) (No. 08-4185); *see also US v. Magnesium Corporation of Am.*, 2007 WL 3046294 (D. Utah 2007)
 - Department of Justice attorneys (Env. & Natural Resources Div.): Robert H. Oakley (John C. Cruden, Acting Assistant Attorney General; Lisa Jones; and David Street, with him on the briefs).

This request includes the following categories of information:

1. transcripts of hearings depositions, and trial testimony of Dr. DeGrandchamp;
2. statements, declarations, and affidavits of Dr. DeGrandchamp;
3. draft and final reports – including progress reports, consultant reports, and expert reports authored by Dr. DeGrandchamp;
4. draft and final protocols involving Dr. DeGrandchamp's work;
5. communications including letters, emails, and phone records – to / from Dr. DeGrandchamp and when he was copied;

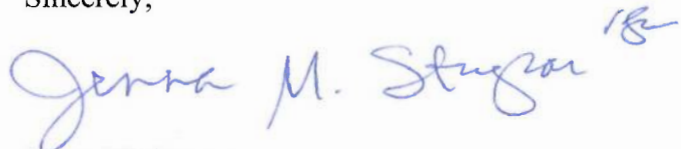
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6. invoices and bills related to Dr. DeGrandchamp's work;
7. photographs and videos pertaining to Dr. DeGrandchamp's testimony or work;
8. documentation of site visits and inspections;
9. internal memoranda, emails, and correspondence pertaining to the government's decision to retain Dr. DeGrandchamp.

To the extent these documents are available on CD or electronically, I prefer to receive them in that format. If costs associated with this request will exceed \$500.00, please notify me with an estimate; I will promptly respond regarding incurring the additional costs.

Thank you in advance. If you have any questions or concerns, please contact me via e-mail or via telephone at (312-526-1590).

Sincerely,

A handwritten signature in blue ink that reads "Jenna M. Stupar" followed by a small flourish.

Jenna M. Stupar
Attorney

JMS